Comment on IN RE: DELETE, DELETE, DELETE

GN Docket No. 25-133

Submitted: March 19, 2025

To Whom It May Concern,

As a small business owner and innovator in communication technology, I am writing to provide input on GN Docket No. 25-133. My work focuses on designing and implementing custom private node networks that leverage publicly available tools, open-source software, and Starlink satellite internet to enable reliable, localized communication via RF handheld radios. These systems allow "nodes" to connect to privately operated servers, facilitating communication across geographic areas. Inspired by the communication breakdowns during the North Carolina disaster in 2024, I have deployed multiple test networks nationwide, achieving flawless performance.

My private node networks are engineered for resilience, offering a critical communication lifeline in scenarios where traditional infrastructure fails—such as natural disasters—while also supporting private, business, and hobbyist applications. A defining feature of these systems is their ability to remain operational even when all other communication systems, including cellular service, are down. By integrating Starlink’s satellite internet with RF technology, these networks provide uninterrupted connectivity as long as satellite service is available, making them a uniquely dependable solution in catastrophic scenarios where conventional options like cellular networks, landlines, and terrestrial internet are rendered inoperable.

Under current Federal Communications Commission (FCC) regulations, only individuals with an amateur radio (ham) license are legally permitted to operate networks of this nature. General Mobile Radio Service (GMRS) licensees, who represent a broader and more accessible segment of the population, are excluded from utilizing similar systems. I respectfully submit that this restriction is overly limiting and impractical, particularly given the

proven capacity of these networks to function when all else fails—a capability that enhances public safety, fosters innovation, and expands communication access.

I recognize the importance of regulations in maintaining order and preventing interference on the airwaves. Licensing and oversight are essential to ensure responsible use of spectrum resources, and I fully support the FCC's role in this regard. However, the current framework places unnecessary barriers on emerging technologies like mine. The ham radio licensing process, while valuable for certain purposes, is overly restrictive for individuals and small businesses seeking to develop and operate private node networks. In contrast, the GMRS license is more attainable, requiring no technical examination and offering a practical pathway for widespread adoption. I urge the FCC to revise its policies to allow GMRS licensees to operate private node networks that integrate RF communications with internet and satellite services like Starlink. Additionally, I propose expanding the GMRS frequency range to accommodate the growing demand for such resilient networks, ensuring sufficient spectrum to support their development and use.

Furthermore, I encourage the FCC to examine the Multi-Use Radio Service (MURS) framework. Expanding the range of available MURS frequencies and aligning its licensing requirements with those of GMRS could further broaden access to this technology. MURS, with its unlicensed operation in certain bands, offers another avenue for innovation and emergency communication. By harmonizing and enhancing the GMRS and MURS frameworks—through expanded frequency allocations and inclusive licensing policies—the FCC could unlock significant opportunities for private citizens, disaster relief organizations, and small businesses to build nationwide communication networks that remain functional when cellular and other systems fail.

These changes would balance the need for regulatory control with greater leniency to encourage innovation. My own experience demonstrates that these systems, built from accessible tools, can function effectively and reliably without overly stringent licensing requirements. Expanding the GMRS and MURS frequency ranges, alongside broader licensing eligibility, would align with the public interest by strengthening communication infrastructure,

supporting economic growth, and empowering individuals to create networks that stand as the last line of communication when all other options are lost.

Thank you for the opportunity to comment on this docket. I am confident that these proposed adjustments will enhance our nation’s communication resilience and provide greater freedom for individuals and businesses to innovate, particularly in times of crisis, while preserving the integrity of our airwaves.

Sincerely,

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